

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC) et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**NOTICE OF MOTION TO MODIFY
PRELIMINARY INJUNCTION AND
PROVIDE INSTRUCTION TO
RECEIVER**

Civil Action No. 24-CV-40-EAW-MJR

MOTION ON BEHALF OF:

Royal Legal Group, LLC, and Hailstone
Legal Group, LLC,
by and through their attorneys,
CONNORS LLP.

**DATE, TIME, AND PLACE
OF MOTION:**

To be determined by this Court, before
the Hon. Michael J. Roemer, United
States District Court Judge, Robert H.
Jackson United States Courthouse, 2
Niagara Square, Buffalo, New York
14202.

Oral argument is requested.

RELIEF REQUESTED:

An Order of this Court modifying the
preliminary injunction to expressly
exclude Royal Legal Group LLC and
Hailstone Legal Group LLC, and
instructing the Receiver to provide each
with full access to tehri client data and
cooperate to transition support services,

together with such other and further relief as this Court deems just and proper.

**GROUNDS FOR
RELIEF REQUESTED:**

Fed.R.Civ.P. 65; Dkt. 184.

SUPPORTING PAPERS:

Declaration of Terrence M. Connors, dated October 17, 2024; Declaration of Rick Gustafson II, dated October 16, 2024; Memorandum of law in Support, together with all prior pleadings and proceedings.

Movants intend to submit reply papers.

DATED: Buffalo, New York
October 17, 2024

/s/ Terrence M. Connors

Terrence M. Connors, Esq.

Andrew M. Debbins, Esq.

CONNORS LLP

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TO: All Parties of Record (via CM/ECF)